

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Criminal No. 12-107

EARL D. WARNER

GOVERNMENT'S NOTICE OF INTENTION TO CALL EXPERT WITNESS

AND NOW comes the United States of America, by its attorneys, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Carolyn J. Bloch, Assistant United States Attorney for said district, submitting as follows:

The government intends to call Corporal Robert J. Pearson of the Pennsylvania State Police as an expert witness during its case-in-chief at trial. Corporal Pearson is an expert in computer forensics. He will testify concerning his forensic examination of the content of one Canon Powershot camera with SanDisk memory card, a second SanDisk memory card and two DVD's. He is expected to testify that he located numerous images and videos of minors engaged in sexually explicit conduct on the above-listed evidence. Corporal Pearson will provide testimony regarding the location of images and videos and the identification of metadata associated with said images and videos.

Corporal Pearson is further expected to testify about the process by which metadata is identified and general information about how such metadata is retained. Anticipated testimony will also include Corporal Pearson's knowledge of child pornography and the identification of said images and videos on the above-mentioned items. It is further anticipated that Corporal Pearson will testify about his physical examination of the Canon Powershot camera and two SanDisk memory cards for information pertaining to place of manufacture. In keeping with his report, attached hereto, he will testify that the camera and memory cards were stamped with the words "MADE IN CHINA".

Corporal Pearson is a certified forensic computer examiner, and is also certified, among other things, in electronic evidence collection. He has testified as an expert witness certified in computer forensics in Pennsylvania's Court of Common Pleas and in federal court. Corporal Pearson's Forensics Reports and Curriculum Vitae are attached hereto and marked, "Exhibit A".

This currently represents the expected and anticipated presentation of expert witnesses on behalf of the government. Of course, the government would also expect, as earlier addressed in open court, that if the defendant anticipates the utilization of an expert witness, that such information be

provided to the government pursuant to Federal Rule of Criminal Procedure 16(b)(1)(A), (B) and (C).

Respectfully submitted,

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s/ Carolyn J. Bloch
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